

EX PARTE OR LATE FILED

Nancy K. McMahon
Attorney

2600 Camino Ramon, Room 2W903
San Ramon, California 94583
(510) 823-0140
Fax (510) 867-0150

PACIFIC BELL
A Pacific Telesis Company

RECEIVED

AUG 23 1993

FCC MAIL ROOM

August 20, 1993

VIA AIRBORNE

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M. Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket No. 92-237, Administration of the North
American Numbering Plan

By this letter Pacific Bell responds to the June 18, 1993, letter signed by James S. Blaszak, counsel for Ad Hoc Telecommunications Users Committee ("Ad Hoc"). In that letter, Ad Hoc responds to Pacific Bell's concerns regarding Ad Hoc's proposal that the Commission initiate a rulemaking to adopt as a nationwide standard Ad Hoc's alternative to the dialing plan recommended by the North American Numbering Plan Administrator ("NANPA"). Ad Hoc's response fails to alleviate Pacific Bell's concerns regarding the inappropriateness of Ad Hoc's proposed dialing plan for Californians.

Ad Hoc advocates the following dialing plan:

for inter-NPA toll calls: 11 digit
(1 + Foreign NPA-NXX-XXXX)

for intra-NPA toll calls: 11 digit
(1 + Home NPA-NXX-XXXX)

for inter-NPA local calls: 10 digit
(Foreign NPA-NXX-XXXX)

for intra-NPA local calls: 7 digit
(NXX-XXX)

No. of Copies rec'd
List A B C D E

071

Mr. William F. Caton
August 20, 1993
Page 2

For Ad Hoc's dialing plan to work, the same NXX cannot be assigned as both a central office code and an NPA code in contiguous NPAs.

In its June 18 letter, Ad Hoc claims that Pacific Bell's concern regarding the practicality of noncontiguous NXX assignment in California can be solved by "earmarking" certain NXX's for use as NPA codes in certain geographic areas. However, Ad Hoc's suggestion does not solve the problem which its proposal creates for future NPA splits in California. In some cases prior to an NPA split in California, virtually all available NXXs are already in use as central office codes, e.g., the 213 and 415 NPA splits in 1991. Indeed, because of Californians' high demand for numbering resources, Pacific Bell and other California local exchange carriers ("LECs") have been using interchangeable NXXs since the early 1970s.

Therefore, it would be extremely difficult, if not impossible to assign any of the 640 new interchangeable area codes in either of these regions without finding that NXX already in use as a central office code in one of the contiguous NPAs. To remedy the situation would require the elimination of the central office code in each contiguous NPA - - which would require thousands of telephone number changes.

Contrary to Ad Hoc's claim, the situation which exists and will continue to exist in the Los Angeles and San Francisco Bay Areas does not violate the North American Numbering Plan ("NANP"). Ad Hoc claims that "the assignment as CO codes of adjacent NPA code sequences is expressly discouraged by Bellcore's North American Numbering Plan Administrator (NANPA). . . ." This is untrue. The BOC Notes on the LEC Networks - - 1990, Numbering and Dialing Procedures, the main technical resource for number assignment,¹ do recommend that:

"Codes for central office assignment should include all NNX type codes, excluding . . . adjacent NPA codes. . . ." (Section 3.3.2)

However, this guideline is expressly qualified by the phrase "to the extent feasible." It would not be feasible to exclude adjacent NPA codes from use as central office codes when use of the NXX as a central office code predates use as an NPA code. For example, when 909 was assigned as an NPA code in the

¹ Issue 1, March 1991, SR-TSV-002275 ("BOC Notes on the LEC Networks").

Mr. William F. Caton
August 20, 1993
Page 3

Orange/Riverside region in 1992, it had already been in use since² October, 1984 as a central office code in the 818 NPA code.² The split did not require that the 818-909 numbers be changed.

While Ad Hoc chastises Pacific Bell for allegedly not conforming to the NANPA "Central Office Code Assignments" guideline discussed above, Ad Hoc ignores the fact that since the 1970's Pacific Bell and other California LECs have been in the process of implementing as reasonably feasible uniform dialing procedures which are consistent with the NANPA's recommended dialing procedure. Section 3.6.1 of Notes on the LEC Networks entitled "Recommended Dialing Procedures," states:

"The preferred dialing format ... is summarized as follows:

7 digits	--	all local station calls and all direct dialed toll calls within the HNPA
1 + 10 digits	--	all FNPA toll or local station calls
0 + 10 digits	--	all HNPA and FNPA calls that are customer dialed and operator assisted." (Emphasis added)

The California Statewide Uniform Dialing Plan adopts this format.³

Furthermore, as stated above, the implementation of the California Statewide Uniform Dialing Plan principles has been taking place in California since before divestiture. Therefore, any allegation by Ad Hoc that Pacific Bell has pursued the Plan in order to inhibit competition is unfounded. Pacific Bell and most of the 22 other California LECs (with the awareness of the California Public Utilities Commission) are administering and implementing the dialing plan recommended by

² Ad Hoc cites two other NPA-NXX cases of alleged violations of central office code assignment in southern California: 213-714 and 818-818. However these NXXs are routing codes only. They are not used as central office codes and are never dialed by end users.

³ The bill insert attached to this letter describes the California Statewide Uniform Dialing Plan.

Mr. William F. Caton
August 20, 1993
Page 4

the NANPA so that nearly all Californians will have the same dialing plan.

Again contrary to Ad Hoc's claim, implementation of the NANPA's preferred dialing format (BOC Notes on the LEC Networks Section 3.6.1) in California has not given rise to customer confusion. Although, for technical reasons, several areas in California must still dial "1 + NXX-XXXX" for intra-NPA toll calls, the vast majority of Californians have been dialing seven digits for all calls within the home NPA with no untoward confusion as to whether a call is within or outside the local calling area.

It should be noted that callers who care about the charge status of a call can easily obtain specific rate information from a number of resources. A listing of local and ZUM 3 (discussed below) prefixes for a call's originating location is available in the Pacific Bell White Pages Directory and from either the O-operator or Pacific Bell business office.⁴ By default, calls to any other prefix would be toll. Callers can also determine the status of calls from their telephone bills and use that information on future calls. There is no reason that in the future these sources of information cannot also be used to determine the calls for which alternative carriers are available.

The confusion Ad Hoc claims exists regarding Pacific Bell's toll and local rate structure is probably due to Ad Hoc's inaccurate use of the words "toll" and "local" with respect to Pacific Bell's rate structure. Ad Hoc uses the term "toll" to refer to intraLATA calls which incur a charge (June 23 letter page 2) and appears to believe that only calls of 16 miles or more are "toll" in California. While Pacific Bell does use the word "toll" to refer to calls of 16 or more miles, calls of shorter distances also incur charges.

Pacific Bell's rate structure includes local calls, "ZUM" calls and "toll" calls. Pacific Bell uses the term "local" to indicate all calls up to 12 miles from the originating location. (More precisely, an end user's local calling area includes the exchange in which the user is located as well as any exchange that has its rate center within twelve miles of the end user's rate center.) Business customers pay \$0.04 for the first minute and \$0.01 for each additional minute for every local call. Residence customers who have flat rate service make all these calls at no charge. Residence customers who

⁴ O-operator and business offices have current information. The White Pages are updated annually.

Mr. William F. Caton
August 20, 1993
Page 5

have measured service receive a \$3.00 call allowance to apply to local and "Zone Usage Measurement" ("ZUM") (discussed below) calls. Once that allowance is exceeded they pay the same rate as business subscribers pay for local calls and all subscribers pay for ZUM calls.

Pacific Bell uses the terms "ZUM," "ZUM Zone 3,"⁵ or "Zone Usage Measurement" as synonyms, to indicate calls that are 12.01 to 16 miles from the originating location in the following major metropolitan areas: San Francisco/East Bay, Los Angeles Extended Area, Orange County Extended Area and San Diego Extended Area. The ZUM is, in fact, a discount for Message Toll Service (MTS) to allow subscribers the benefit from the economies of scale due to the larger usage volumes in the major metropolitan areas. ZUM calls are priced 56% less than the same-distance calls in a non-ZUM area, assuming a 4-minute call length. ZUM prices are \$0.10 for the first minute and \$0.04 for each additional minute. 12.01-16 mile calls in a non-ZUM area are rated from step 3 of the toll schedule, at \$0.20 for the first minute and \$0.10 for each additional minute.

Pacific Bell uses the term "toll" to indicate calls that are 12.01 miles or further from the originating location in non-metropolitan areas that do not have a ZUM Zone 3 area, and calls that are 16.01 or further from the originating location in metropolitan areas that have a ZUM Zone 3 calling area. Therefore, not only is Ad Hoc imprecise to use the word "toll" only with respect to calls over 16 miles, it is equally imprecise to use the word "local" only with respect to calls less than 16 miles from the originating location.

Adoption of Ad Hoc's proposal would, in fact, cause confusion among the millions of Californians subscribing to Pacific Bell's plain old telephone service. Ad Hoc assumes a precise overlap between calls for which charges are measured and "toll." However, as discussed above, both certain local and all ZUM and toll calls give rise to measured rates. Requiring 1+ dialing for only toll calls would not satisfy Ad Hoc's goal of enabling a customer to ascertain whether a call will be subject to a charge or be provided on a "free basis" (June 23 letter, p. 2).

⁵ These ZUM Zone 3 calls carry a different rate than ZUM Zone 1 area (0-8.0 miles) and ZUM Zone 2 area (8.1 to 12 miles) calls, which are charged at the local rate.

Mr. William F. Caton
August 20, 1993
Page 6

Requiring "1+" dialing on all local, ZUM and toll calls in California is not the answer. Doing so would impose undue inconvenience on end users by requiring them to dial "1+" on local calls unless they subscribe to residential flat rate service or have not exceeded the monthly allowance associated with residential measured service.⁶ Adding confusion to inconvenience, the "1+" would not accurately indicate calls for which an alternative carrier might be selected.

Pacific Bell's major concern with Ad Hoc's proposal is the change it would require for the users of most of California's 14 million access lines. Californians are well on the way toward dialing in accordance with the NANPA's recommended format. As explained in Pacific Bell's letter of May 27, 8 of the 13 area codes which Pacific Bell administers (representing 11 million out of 14 million Pacific Bell subscribers) dial in accordance with the California Statewide Uniform Dialing Plan. In June of this year, Pacific Bell notified its subscribers in the 209, 408, 707, 805 and 916 NPAs of the upcoming implementation of the California Statewide Uniform Dialing Plan in those NPAs.⁸

There is no need to mandate a change in the California Statewide Uniform Dialing Plan. Business and residence customers alike in the San Francisco Bay and Los Angeles areas have been using this standard dialing plan for over 20 years without complaint. Imposing Ad Hoc's proposal on Californians would cause unnecessary confusion and costs. Dialing

⁶ Ad Hoc's proposal would apparently require subscribers to residential measured service to begin dialing "1+" whenever they exceed the monthly allowance

⁷ A copy of the bill insert is attached hereto.

⁸ The 408 and 805 NPAs have been using a combination of the Statewide Uniform Dialing Plan and the previous dialing plan for a number of years.

⁹ If the Commission were to require that Ad Hoc's recommendation be adopted in California, the Commission should also develop a federal mechanism to recover the unique costs of reeducating end users and doing the necessary translations.

Mr. William F. Caton
August 20, 1993
Page 7

issues are usually local in nature and handled by state public utility commissions. Pacific Bell therefore urges the Commission not to mandate as a nationwide standard the dialing pattern which Ad Hoc proposes.

Nancy K. McMahon

NANCY K. MCMAHON
Attorney

Attach.

PACIFIC BELL CALLING



CUSTOMER INFORMATION

IMPORTANT

NEW DIALING PROCEDURES

In preparation for a standard dialing plan throughout California, we are beginning to make some changes in the way you dial your calls. The changes affect how you dial your calls, but not the cost of the calls. We will begin making the changes on an area-by-area basis on July 19 and will complete them by October 11, 1993.

WHAT DOES THIS MEAN TO ME?

You should be alert to these new dialing changes. In some cases, the changes may be significant and in others, minimal.

The new "uniform" dialing procedures are:

- Always dial "1" first when calling someone outside the area code you're in. (In some areas of

the state this is already necessary; in many others, it's not.)

- Never dial "1" to begin a seven-digit call within the area code from which you are dialing. (This means that now you can dial a call that is outside your local calling area without dialing "1" first. The charges for these calls will remain the same.)
- Always dial the area code on any operator-assisted or Calling Card call (calls that begin by dialing "0"). You must do this regardless of whether you're calling from the same area code or from outside of it.

Please begin dialing your calls using the above instructions on October 11, or you can begin to do

(over)

TELESIS® SERVICES /

© 1993 Pacific Bell

PACIFIC * BELL®

A Pacific Telesis Company

so whenever the change is made in your area. Your business office can tell you when we plan to make the change in your area. From October 11, 1993, to October 10, 1994, you can use both the new and old way to complete calls. However, after October 10 of next year, you must use the new standard dialing plan for all calls. If you don't, your calls will not go through. You'll reach a recorded announcement that will explain the new dialing procedures and you will have to redial.

WHY THE CHANGE?

The change in dialing procedures will provide many more numbers

for new area codes. Today, area codes must have a zero or a one as the center digit. Once our uniform dialing project is completed, any number can be used as the center digit of a new area code instead of just a zero or a one. This allows for an additional 640 area codes throughout the United States, Canada and the Caribbean islands.

If you have any questions, please call your account representative or our business office, toll free. The number is on the first page of your telephone bill and on page A3 in the Customer Guide section of the Pacific Bell® White Pages.

Si desea obtener esta importante información acerca de los nuevos procedimientos para marcar, por favor llame gratis al Centro Hispano al 1-800-870-5855 para clientes del servicio residencial, o al 1-800-300-2733 para clientes del servicio comercial.

若想查詢有關新撥號程序的重要資訊，請打免費電話到華語服務中心。住宅用戶請撥1-800-281-2288。商業用戶請撥1-800-300-6373。

Muốn biết tin tức quan trọng này về cách thức mới để quay điện thoại, xin gọi Trung Tâm Việt ngữ miễn phí, số 1-800-300-5315.

새로운 다이얼 절차에 관한 이러한 중요 안내사항을 아시고 싶으시면 저희 한인 고객 서비스 센터의 무료 전화번호로 전화해 주십시오. 가정용 전화 고객께서는 1-800-300-6657로 그리고 상업용 전화 고객께서는 1-800-300-0701로 전화해 주십시오.

TELESIS® SERVICES |  PACIFIC  BELL®

BI 3884 6/93

A Pacific Telesis Company